

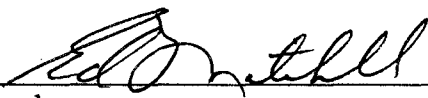
TDEC Small MS4 Annual Report
July 1, 2010 – June 30, 2011
Report due September 30, 2011

Permittee Tracking No. TNS 075116

Permittee Name: Blount County

This report must be signed by a ranking elected official or by a duly authorized representative of that person. See signatory requirements in part 6.7 of the small MS4 general permit.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."


Signed

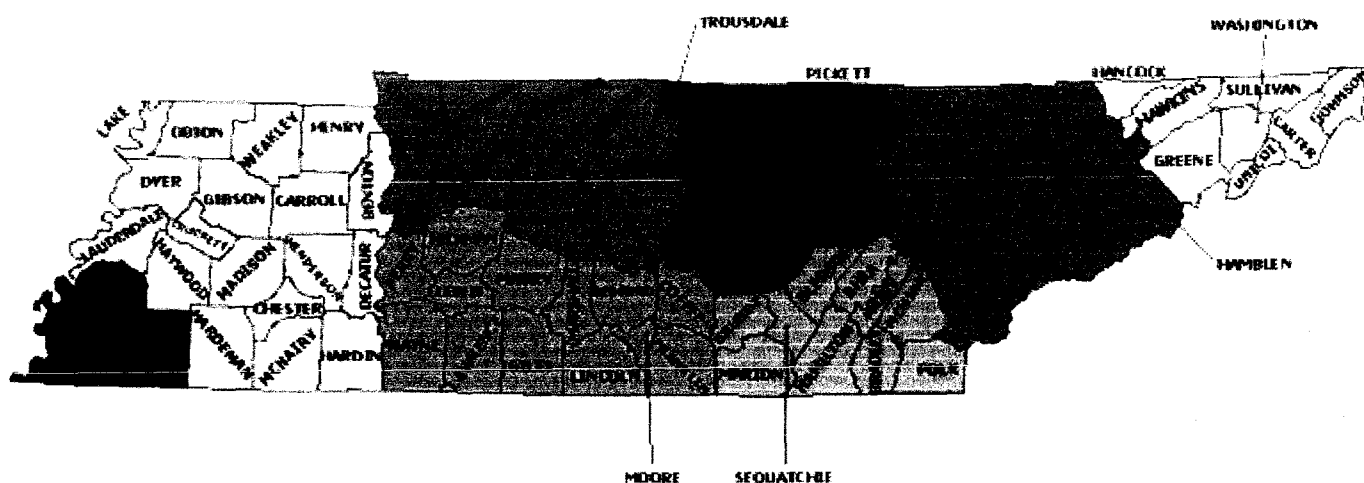
9-27-11
Dated

ED Mitchell Blount Co. Mayor
Printed Name and Title

Send the annual report to the two addresses shown on the next page.

Submit your annual report to the Environmental Field Office for your county as shown in the map below *and* to the following address:

**Mr. Vojin Janjic
Tennessee Division of Water Pollution Control
L&C Annex, 6th Floor
401 Church Street
Nashville, TN 37243-1534**



A. List and Map of the TDEC Environmental Field Offices (EFOs) and Corresponding Counties

EFO Name	EFO Address	List of Counties
Chattanooga	TDEC Division of Water Pollution Control State Office Building, Suite 550 540 McCallie Ave Chattanooga, TN 37402 (423) 634-5745	Bledsoe, Bradley, Grundy, Hamilton, McMinn, Marion, Meigs, Polk, Rhea, Sequatchie
Columbia	TDEC Division of Water Pollution Control 2484 Park Plus Dr Columbia, TN 38401 (931) 380-3371	Bedford, Coffee, Franklin, Giles, Hickman, Lawrence, Lewis, Lincoln, Marshall, Maury, Moore, Perry, Wayne
Cookeville	TDEC Division of Water Pollution Control 1221 South Willow Ave Cookeville, TN 38506 (931) 432-4015	Cannon, Clay, DeKalb, Fentress, Grundy, Jackson, Macon, Overton, Pickett, Putnam, Smith, Trousdale, Van Buren, Warren, White
Jackson	TDEC	Benton, Carroll, Chester, Crockett,

	Division of Water Pollution Control 1625 Hollywood Drive Jackson, TN 38305-2222 (731) 512-1300	Decatur, Dyer, Gibson, Hardeman, Hardin, Haywood, Henderson, Henry, Lake, Lauderdale, McNairy, Madison, Obion, Weakly
Johnson City	TDEC Division of Water Pollution Control 2305 Silverdale Rd Johnson City, TN 37601 (423) 854-5400	Carter, Greene, Hancock, Hawkins, Johnson, Sullivan, Unicoi, Washington Counties
Knoxville	TDEC Division of Water Pollution Control 3711 Middlebrook Pike Knoxville, TN 37921 (423) 594-6035	Anderson, Blount, Campbell, Claiborne, Cocke, Cumberland, Grainger, Hamblen, Jefferson, Knox, Loudon, Monroe, Morgan, Roane, Scott, Sevier, Union
Memphis	TDEC Division of Water Pollution Control 2510 Mt. Moriah Rd, Suite E-645 Memphis, TN 38115-1511 (901) 368-7939	Fayette, Shelby, Tipton
Nashville	TDEC Division of Water Pollution Control 711 RS Gass Boulevard Nashville, TN 37206 (615) 681-7000	Cheatham, Davidson, Dickson, Houston, Humphreys, Montgomery, Robertson, Rutherford, Stewart, Sumner, Williamson, Wilson

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I. Status of Compliance with Permit Conditions (5.4.1) Six Minimum Measures, BMPs and Milestones

B. Status of Compliance with BMP Milestones

The following table is designed for you to report the status of your progress in implementing storm water management BMPs. The table includes a list of BMPs by the code number. These BMP codes refer to the BMPs, and the respective codes, that you submitted to us in your NOI. [Or, in annual reports for years 2-5, these codes refer to amended BMPs as you reported to us in the previous year's annual report]. Add rows if you have more than four BMPs; e.g., 1A, 1B, 1C, 1D, 1E, 1F.

Likewise, the milestone refers to the Year 1 milestone that you included in your NOI. [Or, in subsequent annual reports, the milestone refers to the milestone that you reported to us in the previous year's annual report.]

You must check Yes or No for each of the BMPs that you submitted in your NOI.

- Check **Yes** if the BMP is essentially unchanged and you accomplished the milestone. Indicate a date of completion.
- Check **No** if you did not accomplish the milestone. If you check No, and you are not changing or replacing the BMP or the milestones, indicate the date you expect to complete the milestone.
- Check in one of the **Amended** columns if you wish us to recognize an amended BMP or an amended milestone. If you are amending the BMP, most likely you will also need to amend the milestone, and in that case, check both Amended BMP and Amended Milestone. If the BMP is unchanged, but you are changing milestones in subsequent years, check in the Amended Milestones column.
- If you indicate an amended BMP or milestone, then you should check in last column as well, indicating that you describe the amendment below and provide the necessary analysis in Part VIII.

BMP Code	Milestone	Yes	No	Date completed or If "No," Date to be completed	Amended/Replaced		An "Amended" response is described below and in Part VIII. Yes/No
					BMP	Milestones	
1A	Year 5 cont.	X		June 2011			
1B	Year 5 cont.	X		June 2011			
1C	Year 5 cont.	X		June 2011			
1D	Year 5 cont.	X		June 2011			
2A	Year 5 cont.	X		June 2011			
2B	Year 5 cont.		X	June 2012			
2C	Year 5 cont.	X		June 2011			

2D	Year 5 cont.	X		June 2011			
3A	Year 5 cont.	X		June 2011			
3B	Year 5 cont.	X		June 2011			
3C	Year 5 cont.	X		June 2011			
3D	Year 5 cont.	X		June 2011			
4A	Year 5 cont.	X		June 2011			
4B	Year 5 cont.	X		June 2011			
4C	Year 5 cont.	X		June 2011			
4D	Year 5 cont.	X		June 2011			
5A	Year 5 cont.	X		June 2011			
5B	Year 5 cont.	X		June 2011			
5C	Year 5 cont.	X		June 2011			
5D	Year 5 cont.	X		June 2011			
6A	Year 5 cont.	X		June 2011			
6B	Year 5 cont.	X		June 2011			
6C	Year 5 cont.	X		June 2011			
6D	Year 5 cont.	X		June 2011			

C. Status of compliance for *amended and replaced BMPs*

For every amended/replaced BMP and/or milestone above, provide the compliance status with respect to the new milestone for this year. The new milestones must be detailed in Part VIII.

BMP Code	Mile-stone	Milestone Description	Yes	No	Date completed or If "No," Date to be completed

Explanation for “No” Responses in either table above

BMP Code	Explanation for “No” Response
2B	Blount County will typically try to team up with the Cities of Alcoa and Maryville along with other agencies to hold public forums to discuss water quality. There were no opportunities for public forums this year.

Go to next page.

II. Assessment of the appropriateness of identified BMPs (5.4.1)

For every BMP or amended BMP, assess the appropriateness of the BMP in the following table. For the first year annual report, assume "Good" unless you have evidence to support an inappropriate, minimal or superior assessment.

BMP Code	Short title	We consider the listed BMP appropriate to the following degree:				
		Inappropriate	Minimal	Good	Superior	
1A	Distribute literature				X	
1B	Promote program through local media				X	
1C	Classroom education program			X		
1D	Develop website		X			
2A	Adopt-a-stream program			X		
2B	Public forums		X			
2C	Activities of stakeholders group		X			
2D	Support Little River Watershed Assoc.			X		
3A	Illicit discharge ordinance			X		
3B	Establish mapping program			X		
3C	Illicit discharge inspection plan			X		
3D	Illicit discharge response plan			X		
4A	Construction site runoff seminar for construction personnel				X	
4B	Update erosion control ordinance				X	
4C	Construction site run-off manual				X	
4D	Const. site inspection and enforcement				X	
5A	Amend and adopt post-const. ordinance			X		
5B	Educate developers through TDEC Level I Course				X	
5C	Establish inspection and response plan			X		
5D	Establish a streamside buffer program			X		
6A	Employee training program			X		
6B	Develop a "House Keeping Manual"			X		
6C	Establish in-house inspection program			X		
6D	Obtain and review staff comments		X			

III. Progress with respect to MEP and Measurable Goals (5.4.1)

Element 5.4.1 requires you to report progress towards achieving the statutory goal of reducing the discharge of pollutants to the maximum extent practicable (MEP)¹, and the measurable goals for each of the minimum control measures.

A. MEP

Of the [24]² BMPs that comprise our storm water management program in the six minimum measures, we have accomplished Year 5 (continued) milestones for [23 of 24]³. This does represent substantial progress in achieving the statutory goal of reducing the discharge of pollutants to the MEP.

B. Measurable goals

Of the [24] BMPs shown above, we have accomplished Year 5 (continued) milestones for [23 of 24]. This represents progress toward achieving the measurable goals identified in our original NOI and in this annual report. For the measurable parameters/goals we have been able to track for this past year, the measurements are recorded in Part IX.


Signed

9-27-11
Dated

Ed Mitchell MAYOR
Printed Name and Title

Go to next page.

IV. Results of Information Collected and Analyzed (5.4.2)

Element 5.4.2 of the permit requires you to report results of information collected and analyzed, if any, during the reporting period, including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP

A brief summary of information, including analytical and/or non-analytical monitoring results, is listed below. Detailed information is collected and available at the offices of the MS4.

Parameter	Relevant BMP, or Purpose of Information	Conclusions
NA	NA	NA

Go to next page.

V. Planned Activities and Proposed Changes to the Storm Water Management Program (5.4.3 and 5.4.4)

A. Storm water activities planned for next reporting cycle

Element 5.4.3 requires a summary of the storm water activities you plan to undertake during the next reporting cycle (including an implementation schedule).

The storm water activities planned for the next reporting cycle are the BMPs as reflected in our NOI and as amended (if any) in subsequent annual reports, including this annual report, and are as follows:

BMP Code	Title/Name of BMP	Milestone for next reporting cycle
1A	Print and distribute literature to the general public	Use existing materials and develop new written materials.
1B	Educate the general public through local media	Work with local media groups relative to our program and educate the general public.
1C	Develop a citizen based Adopt-A-Stream Program	Continue to recruit and educate volunteers and provide guidelines about the program.
1D	Presentation to local schools concerning pollution prevention	Partner with Keep Blount Beautiful and other entities to develop a presentation series for county schools.
1E	Develop a website and update with latest information	Update the website with relevant information and links.
1F	Support and assist in the Little River Watershed Assoc. and/or the Little River Water Quality Forum	Meet on a regular basis and encourage the activities of the group(s).
1G	Public Information and Education Plan (PIE)	Gather information and develop a PIE Plan as required by Section 4.2.1 of the General Permit.
2A	Illicit Discharge Resolution	Evaluate the effectiveness and make any necessary changes.
2B	GIS Mapping Program	Continue to update and maintain a storm sewer system map.
2C	Illicit Discharge Inspection and Response Plan	Continue to implement inspections and require corrective actions if needed via the response plan.
2D	Illicit Discharge Enforcement Response Plan (ERP)	Gather relevant information for proposed ERP as per Section 4.2.3 of the General Permit.
3A	Sediment and Erosion Control Resolution	Draft an amended resolution to be consistent with the current NPDES General Construction Permit.
3B	Land Disturbance Inventory	Develop and maintain an inventory of all active public and private construction sites that require county grading permits.
3C	Site Plan Review and Site Inspection Process	Draft an amended site plan review and site inspection process.

3D	Construction Site Enforcement Response Plan (ERP)	Gather relevant information for proposed ERP.
4A	Permanent Stormwater Management Resolution	Evaluate the effectiveness of the existing resolution.
4B	Water Quality Buffer Resolution	Evaluate the effectiveness of the existing resolution.
4C	Codes and Ordinance Review and Update	Defer till year 2.
4D	Inventory and Tracking of Best Management Practices	Develop and implement an inventory for tracking of BMPs at new development and redevelopment projects.
5A	Education and training for relevant county employees concerning pollution prevention	Perform annual training for relevant county employees on stormwater pollution prevention.
5B	House Keeping Manual (O&M Program)	Evaluate the effectiveness of the existing O&M Programs and make any necessary changes.
5C	In-house Inspection Program	Perform annual inspections of relevant county owned and operated facilities to ensure the proper use of pollution prevention measures.
5D	Obtain and review staff comments from an "idea/suggestion box"	Review comments and suggestions and consider changes to be made.

Additional, significant activities planned for the next reporting cycle are noted below.

Activity	Summary Description	Purpose
Continue public education, stream monitoring, install agriculture BMP's, and repair failing septic systems.	Blount County Soil Conservation District along with TVA received an EPA Targeted Watershed Grant for approximately \$835,000.	Continue to improve water quality within the Little River Watershed including Crooked Creek, Ellejoy Creek, Pistol Creek, and Nails Creek.
Perform detention pond retrofits, continue to install agriculture BMP's, conduct 3 public input sessions, and continue to repair failing septic systems.	Blount County Soil Conservation District along with TVA received a TN Dept. of Ag. 319 grant for \$300,000.	To improve water quality within Baker Creek and Centenary Creek watersheds.

B. Proposed changes to storm water management program

Element 5.4.4 requires a report on proposed changes to your storm water management program, including changes to any BMPs or any identified measurable goals that apply to the program elements.

Amended and replacement BMPs (if any) are reflected in Part I.A. and Part VIII, and in the above table and will not be repeated here. Additional, proposed changes are noted below.

Change to Program	Summary Description	Rationale
General program changes.	Program changes will be reported in 2012. Changes include BMPs, monitoring, timelines, etc.	New NPDES MS4 Permit requirements. NOC issued May 20, 2011.

VI. Water Quality Controls for Discharges to Impaired Waterbodies (3.1.2)

The table below lists impaired waterbodies affected by discharges from this MS4, the pollutants of concern, and the two BMPs we believe to be the most significant in controlling discharges of these pollutants.

Stream Name	Pollutants	Priority BMP 1	Priority BMP 2
Pistol Creek	Loss of biological integrity due to siltation & Escherichia coli	Erosion Control Resolution	Distribute literature to the general public
Brown Creek	Nitrate + Nitrite, Stream-side alteration, Loss of biological integrity due to siltation & Escherichia coli	Erosion Control Resolution	Distribute literature to the general public
Russell Branch	PCB's & Loss of biological integrity due to siltation	Erosion Control Resolution	Distribute literature to the general public
Springfield Branch	Nitrate + Nitrite & Loss of biological integrity due to siltation	Erosion Control Resolution	Distribute literature to the general public
Laurel Bank Branch	Loss of biological integrity due to siltation	Erosion Control Resolution	Distribute literature to the general public
Peppermint Branch	Loss of biological integrity due to siltation & Escherichia coli	Erosion Control Resolution	Distribute literature to the general public
Flag Branch	Loss of biological integrity due to siltation, Escherichia coli & Habitat loss	Erosion Control Resolution	Distribute literature to the general public
Duncan Branch	Flow alteration	Erosion Control Resolution	Distribute literature to the general public
Caney Branch*	Physical substrate habitat alteration	Distribute literature to the general public	Public involvement opportunities
Little River	PCBs and undetermined stressor	Erosion Control Resolution	Distribute literature to the general public
Culton Creek	Loss of biological integrity due to siltation & Escherichia coli	Distribute literature to the general public	Public involvement opportunities
Crooked Creek *	Escherichia coli	Distribute literature to the general public	Public involvement opportunities
Nails Creek *	Escherichia coli	Distribute literature to the general public	Public involvement opportunities
Polecat Creek	Habitat loss & Loss of biological integrity due to siltation	Erosion Control Resolution	Distribute literature to the general public

Baker Creek *	Stream-side alteration & Escherichia coli	Distribute literature to the general public	Public involvement opportunities
Centenary Creek*	Stream-side alteration & Loss of biological integrity due to siltation	Distribute literature to the general public	Public involvement opportunities

* = Represents water bodies affected by pollutant source(s) from pasture grazing, livestock in stream, and/or animal feeding operations. These pollutant sources are not regulated under our NOI.

The table below lists impaired waterbodies for which the state has promulgated a TMDL. For the waterbodies indicated, we have complied with the requirements of the permit as noted by the check marks. [The table below includes two columns for two TMDLs. If additional space is needed, add additional table(s).]

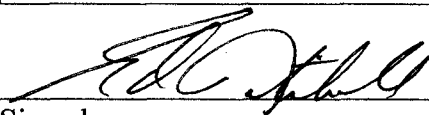
	Waterbody Name/ Pollutant of Concern	Waterbody Name/ Pollutant of Concern
Permit Requirement	Ft. Loudon Lake/ Siltation and Habitat Alteration	Little River and Tributaries in Blount County / Pathogens
3.1.3.1 Is the pollutant likely to be found in storm water discharges from the MS4?	It's likely, but we have not tested.	It's likely, but we have not tested.
3.1.3.2 Does the <u>TMDL</u> include a pollutant wasteload allocation, implementation recommendations, or other performance requirements specifically for storm water discharges from your MS4?	Yes	Yes
3.1.3.3 Does the TMDL address a flow regime likely to occur during periods of storm water discharge?	No	No
3.1.3.4 If the above three questions are true, does implementation of existing storm water control measures meet the TMDL provisions?	Not known	Not known
3.1.3.4-Or are additional control measures are necessary?	Not known	Not known
3.1.3.5 Current and planned control measures are documented.	No	No
3.1.3.6 Describe method to evaluate whether storm water controls are adequate to meet the requirements of the TMDL.	Not applicable yet	Not applicable yet
3.1.3.7 If additional or modified controls are necessary, describe the type and schedule for the control additions/revisions.	Not applicable yet	Not applicable yet

VII. Protection of Listed Threatened or Endangered Species (3.2)

We have followed the procedures given in section 3.2 of the Tennessee small MS4 general permit to ascertain whether or not storm water discharges from the MS4 are likely to jeopardize the continued existence of any species that are listed as endangered or threatened under the ESA, or result in the adverse modification or destruction of habitat that is designated as critical under the ESA ("critical habitat"). Below is a table indicating the procedures we have followed. We retain documentation of the evaluations and decisions reached through the evaluation.

[See the permit at section 3.2 for more detailed list of evaluation criteria.]

Evaluation criteria	Yes/No	Notes
3.2.1.2.1 Criteria A: No endangered or threatened species or critical habitat in proximity to MS4 or the point where discharges reach the receiving water	No	
3.2.1.2.2 Criteria B: Formal or informal consultation with the Fish and Wildlife Service under Section 7 of the Endangered Species Act (ESA) has been concluded and that consultation addressed effects of storm water activities or resulted in a no jeopardy or not-likely-to-affect opinion.	Yes	Had an informal consultation with U.S Fish and Wildlife Service to receive information about threatened and endangered species and critical habitat within Blount County. A map of these areas was supplied to us.
3.2.1.2.3 Criteria C: Activities are authorized under Section 10 of the ESA		
3.2.1.2.4 Criteria D: Evaluated the effects of storm water discharges; we do not have reason to believe the discharge and discharge-related activities will jeopardize species or cause adverse modification or destruction of critical habitat.		Our NOI was accepted and we are making progress in meeting the BMP's, therefore, we should not be affecting threatened or endangered species and critical habitat.
3.2.1.2.5 Criteria E: Our storm water discharges and related activities are already addressed in another operator's certification of eligibility. We agree to comply with conditions of that eligibility.	No	


Signed

9-27-11
Dated

Ed Mitchell MAYOR
Printed Name and Title

VIII. Explanation of Amended or Replaced BMPs (from Part I)

The following table provides description(s) of BMPs and/or milestones we wish to amend this reporting year and subsequent years, as indicated. [Add tables as necessary.]

For every BMP that is being amended or replaced, provide the following information and analysis. The BMPs you describe here should match the ones you indicated as "Amended/Replaced" in Part I.B. of this annual report.

BMP Code: _____	BMP:
New BMP short title:	
New BMP description:	
BMP is being amended/replaced as:	Ineffective <input type="checkbox"/> Infeasible <input type="checkbox"/> See narrative. <input type="checkbox"/>
Expected effectiveness of new BMP:	
Why is the replacement BMP expected to achieve goals:	
BMP Milestone Year 1	
BMP Milestone Year 2	
BMP Milestone Year 3	
BMP Milestone Year 4	
BMP Milestone Year 5	
Narrative:	

Go to next page.

IX. Tracking of measurable goals

For each of your BMPs, you should have established a measurable parameter, and goal in terms of that measurable parameter. Measurable parameters are ways to measure activities or effects of a BMP. The goal is the parameter value established as a target. If you are not yet measuring the parameter for a given BMP, indicate Not Applicable Yet (NAY) in the Result column.

BMP Code	BMP Title	Measurable parameter	Result	Goal
1A	Print and distribute literature	Distribute literature to the general public	6 Publications distributed at Court House, environmental/stormwater office, and local Library.	Distribute & revise material if necessary
1B	(As amended) Promote program through local media	Educate the public through the newspapers articles (amended to local media)	"Prevent Stormwater Pollution" tips in Keep Blount Beautiful Newsletter with link to County website, TAB radio spots with Water Works and TNSA totaling 12,967 spots.	Present material
1C	Classroom education program	Presentation to local schools concerning stormwater pollution prevention.	Presented water quality material/info. via talks and handouts to all 2 nd grade classrooms, approximately 894 county students. Contracted Keep Blount Beautiful to also help with classroom education totaling 2,541 adults and 1,578 students.	Develop and present material/info
1D	Develop website	Provide information on county stormwater program and activities	No new information to update	Update with latest information
2A	(As amended) Adopt-a-stream program	Development of a citizen based program to clean local stream (not monitor).	Educated and informed public of program. Had 2 streams cleaned twice.	Educate volunteers and provide guidelines.
2B	Quarterly public forums with the Little River Watershed Association (LRWA)	A quarterly public forum to obtain and discuss public comments and concerns.	No opportunity for public forums to discuss water quality in Blount County.	Establish meeting schedules and topics to discuss with the public.
2C	Activities of stakeholders group	The stakeholders group will continue its activities to promote and enhance the stormwater program.	No new relevant information needed feedback from group.	Continued activities of the group
2D	Support the "Little River Watershed Association"	Assist and encourage the activities of the group.	Volunteered as a technical expert for a	Schedule regular

	(LRWA)		LRWA event and participated in the Little River Water Quality Forum	meetings with group and sponsor
3A	Illicit discharge ordinance	Adoption of ordinance	Ordinance posted on county web site. No changes needed.	Make ordinance known and evaluate for changes
3B	Establish mapping program	Accurately map the existing stormwater system providing locations of system components and outfalls.	Completed mapping of county. Mapped some newly constructed features.	Finish mapping all areas (4) equal to 4/4 the area
3C	(As amended) Illicit discharge inspection plan	Establish illicit discharge inspection procedures and a schedule	Some visual inspections were performed at commercial sites and some potential hot spots.	Implement inspections and revise if necessary
3D	(As amended) Illicit discharge response plan	A plan for appropriate responses for discrepancies that are discovered.	Responded to citizen complaints and ID's discovered during GIS mapping inspections. No revisions necessary.	Implement response plan and revise if necessary
4A	(As amended) Annual seminar for construction personnel	Yearly workshop for construction personnel to educate them on erosion control measures for construction sites	Informed and encouraged attendance to TDEC course. Link to course info on County website.	Continue to advertise and encourage attendance
4B	Update erosion control ordinance	The update of the ordinance will attempt to standardize the ordinance with neighboring government entities.	Made ordinance known on website and in hand outs. No changes needed.	Make ordinance known and revise if necessary
4C	Develop construction site run-off manual	Develop manual using Tennessee Construction Site BMP's the apply to Blount Co.	No changes needed	Review yearly and make necessary changes
4D	(As amended) Const. site inspection and enforcement	Establish a program to permit, inspect, and enforce regulations for erosion control on construction sites	Permits issued and inspections performed. Building codes inspectors help inspect. No changes needed.	Review effectiveness and revise program as necessary
5A	Review and amend post-const. ordinance	This will include the review of existing ordinances and amending them as necessary to address post-const. runoff.	Made ordinance known on website. No changes needed.	Make ordinance known and evaluate for any changes
5B	(As amended) Educate developers	Establish annual workshops for developers concerning	TDEC Level 1 Course workshop advertised	Continue to require

		post-const. runoff.	including a link on County website.	TDEC course
5C	(As amended) Establish inspection and response plan	This program will provide inspectors to inspect erosion control and drainage structures after construction. Establish responses to discrepancies found by inspectors concerning maintenance of structures.	No new structures installed following plan adoption, therefore no inspections. No changes needed.	Review effectiveness and revise as necessary.
5D	(As amended) Establish a streamside buffer program	Create a draft of a streamside buffer program for development and redevelopment areas around streams.	Made ordinance known on County website. Will amend with new MS4 permit requirement.	Make ordinance known and evaluate for any changes
6A	(As amended) Employee training program	Education and training for county employees concerning stormwater pollution prevention.	94 relevant employees received stormwater pollution prevention training. No new county employees to receive TDEC Level 1. Current employees with TDEC Level 1 to receive Level 1 refresher course when needed.	Continue to require relevant employees to attend TDEC Level 1 and in-house training on stormwater pollution prevention
6B	(As amended) Develop a "House Keeping Manual"	Develop a written document describing proper pollution prevention. The manual will be distributed to relevant county employees.	No changes needed.	Review effectiveness and revise as necessary.
6C	Establish in-house inspection program	Inspection of county facilities to ensure the proper use of pollution prevention measures.	Inspected 3 relevant County facilities.	Implement yearly inspections
6D	Obtain and review staff comments	Develop an "idea box" for employee suggestions concerning pollution prevention.	Reviewed all comments and considerations. No pertaining water quality suggestions comments received.	Review comments and consider changes

Footnotes

¹ *Maximum extent practicable (MEP)* is the statutory standard that establishes the level of pollutant reductions that operators of regulated MS4s must achieve. The CWA requires that NPDES permits for discharges from MS4s "shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques and system, design and engineering methods." CWA 402(p)(3)(B)(iii).

² Insert the number of BMPs listed in your NOI, as updated by subsequent annual reports. Example: if each minimum measure has five BMPs associated with it, you would insert [30] as the number of BMPs. [6 X 5]

³ Insert the number of Year 1 milestones accomplished. For example, if 27 Year 1 milestones are accomplished at the end of Year 1, then you would insert [27 of 30] in these brackets.